

III. REMARKS

Claims 1-2, 4-12, 14, 16-23 and 25-31 are pending in this application. By this amendment, claims 1, 11, 18, and 26 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

Entry of this Amendment is proper under 37 C.F.R. 1.116(b) because the Amendment: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicants respectfully request entry of this Amendment.

In the Office Action, claims 1-2, 4-12, 14, 16-23 and 25-31 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Burks *et al.* (U.S. Patent No. 5,644,778), hereafter "Burks." Applicants respectfully traverse this rejection.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Applicants respectfully submit that the Burks reference fails to meet each of the three basic criteria required to establish a *prima facie* case of obviousness. As such, the rejection

under 35 U.S.C. 103(a) is defective.

With regard to the 35 U.S.C. §103(a) rejection over Burks, Applicants assert that Burks does not teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 11, 18 and 26, Applicants submit that, contrary to the Office's assertion, Burks fails to teach or suggest, *inter alia*, a translation system for translating a transaction element sent from a first trading partner intended for a second trading partner specified by the first trading partner. Instead, the passage in Burks cited by the Office teaches that a medical transaction system that

...includes a communication receiver capable of communication with the plurality of healthcare provider computer stations using a variety of communication protocols and data message formats, a compiler for compiling information from the data messages transmitted by the healthcare provider computer stations, the compiled information being put in generic records having a format that is independent of the communication protocol and format of the data messages, an extractor for extracting some of the generic records associated with a trading partner computer station identification code, a formatter for formatting message information from the extracted generic records in a format corresponding to the trading partner computer station identification code, and a communications transmitter for transmitting the formatted message information to a trading partner in a communication protocol and data message format recognized by the trading partner. Col. 3, lines 2-25.

As such, it is the medical transaction system in Burks that has the extractor for extracting the generic records and a transmitter for transmitting the formatted message not the healthcare provide computer station. Col. 3, lines 16-18. Accordingly, it is not the original healthcare provider computer station that specifies to whom a data message is sent, but rather the medical transaction system. Nowhere, does Burks teach that the data message is intended for a trading partner that is specified by the healthcare provider computer. In contrast, the present invention includes "...a translation system for translating a transaction element sent from a first trading partner intended for a second trading partner specified by the first trading partner." Claim 1. As

such, the first trading partner as included in the claimed invention, does not merely send a data message to a system that then determines whether and to whom to send the information as does the healthcare provider computer station in Burks, but instead the transaction element that the first trading partner sends is intended for a second trading partner specified by the first trading partner. Thus, the transaction element that is intended for a second trading partner as included in the present invention is not equivalent to the information that is sent to the medical transaction system of Burks. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With further respect to independent claims 1, 11, 18 and 26, Applicants respectfully submit the Burks fails to teach or suggest, *inter alia*, a routing system for routing the transaction element from the first trading partner to the second trading partner in a communication protocol of the second trading partner. Specifically, the passage in Burks cited by the Office teaches that the medical transaction system compiles information from data messages sent to it, puts the compiled information into generic records, extracts some of the generic records, formats generic records in a outgoing format, and transmits the formatted message information to a trading partner. Col. 3, lines 2-25. As such it is not a particular data message that is sent, but is instead an amalgamation of information that has been compiled from numerous data messages. The claimed invention, in contrast, includes "...a routing system for routing the transaction element from the first trading partner to the second trading partner in a communication protocol of the second trading partner." Claim 1. As such, the transaction element as included in the claimed invention is not a formatted message that includes information from multiple data messages that has been compiled, put into generic records, reformatted, and transmitted, but instead the same

transaction element is routed from the first trading partner to the second trading partner.

Accordingly, Applicants request withdrawal of the rejection.

With respect to claims 2 and 23, Applicants respectfully submit that Burks fails to teach or suggest, *inter alia*, a mapping system for mapping the transaction element, wherein the mapping system includes a system for determining: a source of the transaction element, an application to which the transaction element is regarding, and a recipient to which the transaction element should be routed. As stated above, the passage cited by the Office teaches that the medical transaction system of Burks compiles information from data messages sent by healthcare provider computer stations, puts the compiled information into generic records, extracts some of the generic records, formats the generic records in a format corresponding to a trading partner, and transmits the formatted message information to the trading partner. Col. 3, lines 2-25. However, nowhere in the cited passage or elsewhere does Burks teach that by mapping the data message, the medical transaction system determines the source of the data message, the application to which the transaction element is regarding, and the recipient to which the transaction element should be routed. In fact, Burks never specifies that any of these specific characteristics are included in the data message. In contrast, the claimed invention includes "...a mapping system for mapping the transaction element, wherein the mapping system includes a system for determining: a source of the transaction element, an application to which the transaction element is regarding, and a recipient to which the transaction element should be routed." Claim 2. As such, the mapping system as included in the claimed invention does not merely compile information from a data message as does the compiler in Burks, but instead maps the transaction elements, which includes determining the source of the transaction element,

determining the application to which the transaction element is regarding, and determining the recipient to which the transaction element should be routed. Thus, the mapping system as included in the claimed invention is not equivalent to the compiler as included in the claimed invention. Accordingly, Applicants request that the Office withdraw its rejection.

With respect to claims 7, 16 and 29, Applicants submit that Burks fails to teach or suggest, *inter alia*, the first and second trading partners are selected from the group consisting of: an automotive manufacturer, an automotive parts locator, an automotive parts supplier, an automotive lending provider, a credit reporter, a motor vehicle department, an automotive insurance provider, and an automotive consumer facilitator. Specifically, the passage in Burks cited by the Office teaches "...transmitting the formatted message information to a trading partner." Col. 3, lines 23-24. However, Burks never specifies that the trading partners are selected from the group consisting of: an automotive manufacturer, an automotive parts locator, an automotive parts supplier, an automotive lending provider, a credit reporter, a motor vehicle department, an automotive insurance provider, and an automotive consumer facilitator, as the claimed invention does. As such, the trading partners as included in the claimed invention are not generic trading partners as in Burks, but may instead be selected from the above group. For the above reasons, the trading partners in Burks are not equivalent to the first and second trading partners as included in the claimed invention. Accordingly, Applicants request that the Office's rejection be withdrawn.

With respect to claims 8, 17, 22 and 20, Applicants respectfully submit that Burks fails to teach or suggest, *inter alia*, the transaction element and the response transaction element pertain to an automotive application selected from the group consisting of: automotive parts, automotive

sales, automotive service, automotive insurance, automotive registration, automotive financing, automotive warranty, and credit reporting. In contrast, the passage cited by the Office teaches that the Burks medical transaction system may bidirectionally communicate with trading partners to receive data messages that "...include remittance and claim adjudication information from payors, electronic funds transfer messages to financial institutions, and medical data records from insurance carriers and medical service sites such as laboratories and the like." Col. 7, lines 10-24. However, nowhere does Burks teach that the data messages in its medical transaction system pertain to an automotive application selected from the group consisting of: automotive parts, automotive sales, automotive service, automotive insurance, automotive registration, automotive financing, automotive warranty, and credit reporting, as the claimed invention does. As such, the transaction element as included in the claimed invention pertains to the automotive applicants specified above and not merely to the medical related applications specified in Burks. Thus, the transaction element as included in the claimed invention is not equivalent to the data messages in Burks. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

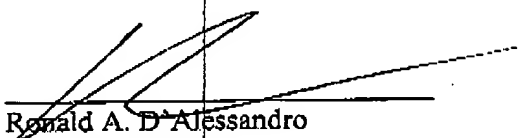
With respect to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the dependent claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

IV. CONCLUSION

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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